

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 2738 (MAS) (RLS)**

**[PROPOSED] ORDER**

**THIS MATTER** having been opened to the Court by Defendant Johnson & Johnson (“Defendant”) for entry of an Order sealing materials, specifically the unredacted version of Defendants’ Omnibus Motion for Summary Judgment filed on November 8, 2023 (corresponding to the redacted version of the same document, originally filed on June 18, 2021), which contains personal health information and personal identifying information, and the Court having considered the submissions of the parties, and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2023,

**ORDERED** as follows:

1. Defendants’ Motion to Seal Defendants’ Omnibus Motion for Summary Judgment filed on November 8, 2023 (corresponding to the redacted version of the same document, originally filed on June 18, 2021), which contains personal health information and personal identifying information, is hereby **GRANTED**. The document shall be maintained under seal in its entirety.

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Hon.